

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

FILED  
UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

96 SEP 11 PM 2:17 *la*

-----X  
CARL WILSON, an individual, and :  
AUDREE WILSON, an individual, :

Plaintiff, :

v. :

HARPERCOLLINS PUBLISHERS, INC., :  
a Delaware corporation, :

Defendant. :

*Robert M. Mangel*  
CLERK-ALBUQUERQUE

94 Civ. 892 (JC)

-----X  
CERTIFICATE OF COMPLIANCE

1. I, KATHERINE J. DANIELS, am an associate at the law firm of Weil, Gotshal & Manges LLP, counsel for defendant HarperCollins Publishers Inc. in the above referenced action. I submit this Certificate of Compliance in support of HarperCollins' Motion to Compel and for Sanctions.

2. During two telephone conversations with Beth F. Dumas, counsel for plaintiffs Carl and Audree Wilson, on August 6, 1996 and August 7, 1996 I made a good faith effort to secure the discovery requested in HarperCollins' motion without the Court's intervention but was unable to do so. Notwithstanding my protestations concerning plaintiffs'

assertions of inappropriate objections and answers that are not responsive to, and indeed evasive of, the requests, plaintiffs have failed to supplement or amend their responses. Furthermore, when plaintiffs served Carl Wilson's delinquent interrogatory responses on April 19, 1996 they suffered from many (if not most) of the very same deficiencies. It is clear to me that the Court's intervention is necessary to secure the requested discovery.

  
Katherine J. Daniels